

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**THOMAS PLUMLEY and
AUBREY PLUMLEY,
Plaintiffs,**

vs.

**LIBERTY INSURANCE CORPORATION
Defendant**

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**Civil Action No. 4:16-CV-01965
(JURY)**

JOINT MOTION TO DISMISS WITH PREJUDICE

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Thomas Plumley and Aubrey Plumley, Plaintiff, and Liberty Insurance Corporation, Defendant, and file this Joint Motion for Dismissal With Prejudice, and in support thereof would show the Court as follows:

I.

The parties have settled all issues and claims between them in this matter and wish to fully and finally dispose of this lawsuit.

II.

Therefore, the parties desire that the Court sign an Agreed Order of Dismissal With Prejudice which will fully and finally dispose of all claims and issues by and between the parties, and accordingly ask the Court to sign the attached “Agreed Order of Dismissal With Prejudice” and present it to the Clerk of Court for entry.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs Thomas Plumley and Aubrey Plumley and Defendant Liberty Insurance Corporation pray this Court grant their Joint Motion

for Agreed Order of Dismissal With Prejudice and sign the attached Agreed Order of Dismissal With Prejudice, and for such other and further relief as to which they may show themselves to be entitled.

Respectfully submitted,

CHAD T. WILSON LAW FIRM PLLC



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**ATTORNEYS FOR PLAINTIFFS
THOMAS PLUMLEY AND AUBREY
PLUMLEY**

Respectfully submitted,

SHEEHY, WARE & PAPPAS, P.C.

By: /s/ J. Mark Kressenberg

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**ATTORNEYS FOR DEFENDANT LIBERTY
INSURANCE CORPORATION**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above foregoing instrument has been forwarded via e-filing in accordance with the Federal Rules of Civil Procedure on this the 24th day of October, 2016, to the following counsel of record:

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/s/ J. Mark Kressenberg

J. Mark Kressenberg

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